

EXHIBIT A

The chart below describes the metadata fields to be produced in generic, commonly used terms which the producing party is to adapt to the specific types of ESI it is producing, to the extent such metadata fields are included in the original electronic documents and can be customarily extracted as part of the electronic data discovery process. Any ambiguity about a metadata field is to be discussed with the receiving party prior to processing and production.

Field Name	Field Description
BegBates	Beginning document number
EndBates	Ending document number
BegAttach	Beginning document number of family unit
EndAttach	Ending document number of family unit
All Custodians	All names of people the document was collected from even if removed from production as a duplicate
Attachment Count	Number of attachments, same as Family Count
Author	Author field extracted from the metadata of the native file
From	Sender of the e-mail message
Recipient(s)	Recipient(s) of the e-mail message (To)
CC	Recipient(s) of “carbon copies” of the e-mail message
BCC	Recipient(s) of “blind carbon copies” of the e-mail message
Subject	Subject field extracted from the metadata of the native file
Sent Date	Date the e-mail message was sent (produced in “MM/DD/YYYY” format)
File Type	Mail, attachment, individual file
File Extension	File extension of document (.msg, .doc, .xls, etc.)
File Name	Name of original file
Title	Title of a non-email document (Microsoft Title field)
Hash Value	MD5 or SHA-1 Hash Value, unique document identifier
Nativelink	Relative file path to each native file on production media
Date Created	For non-emails (produced in “MM/DD/YYYY” format)
Redaction	Populate with Yes or No to indicate whether document contains redactions
Confidentiality	Populate with any confidentiality designation attached to the document
Source	The name of the producing party
Author	Author field extracted from the metadata of a non-email attachment
Custodian	Name of custodian or noncustodial source of document
Filepath	File/path of the location where the item was located at the time of collection
All File Paths	When global deduplication has been employed, all file paths to native files as they existed in original environment
ModifiedBy	Last user to modify non-email document as extracted from file system metadata or bib coding
ModifiedDate	The application recorded time on which a non-email document was last modified as
Redaction Reason	If the document contains redactions, the reason(s) for those redaction

EXHIBIT B

The chart below describes the metadata fields to be produced for Hardcopy Documents.

Field Name	Description of Field
BegBates	Beginning document number
EndBates	Ending document number
BegAttach	Beginning document number of family unit
EndAttach	Ending document number of family unit
All Custodians	All names of people the document was collected from even if removed from production as a duplicate
File Type	Mail, attachment, individual file
Redaction	Populate with Yes or No to indicate whether document contains redactions
Confidentiality	Populate with any confidentiality designation attached to the document
Source	The name of the producing party
Hardcopy	Indicates whether document is Hardcopy document that was scanned for production (Y/N)
Custodian	Name of custodian or noncustodial source of document
Redaction Reason	If the document contains redactions, the reason(s) for those redaction